

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. et al.,

Defendants.

CASE NO. 1:17-cv-02635-CAB

JUDGE CHRISTOPHER A. BOYKO

JOINT PROPOSAL FOR TRIAL DATES

The Parties (Plaintiff James Hayden and Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc.) together submit this Joint Proposal for Trial Dates pursuant to the Court's October 5, 2022 Order. The Parties propose a trial start date of **May 1, 2022**. The Parties note that this Court's October 5, 2022 Order also indicated that the Court may set new deadlines for all related trial submissions, such as jury instructions, trial briefs, witness lists and motions in limine. As the Parties indicated during the October 5, 2022 Status Conference, the Parties agree that revised jury instructions are warranted. The Parties propose submitting the revised jury instructions on **March 3, 2022**. As to other trial submissions, for example, motions in limine and trial briefs, the Parties defer to the Court as to whether any new submissions would be useful. In light of the pretrial submissions submitted by the Parties on August 1 and August 29, including motions in limine, Plaintiff submits that, at minimum, no further briefing on motions in limine is required. If the Court does set dates for other trial submissions, the Parties respectfully propose submitting motions in limine and trial briefs on **March 3, 2022**, which would include, *inter alia*, jury instructions, and submitting oppositions to motions in limine on **March 31, 2022**.

DATED: October 14, 2022

/s/ Dale M. Cendali

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CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2022, I electronically filed the foregoing Joint Proposal for Trial Dates with the Clerk of Court using the ECF system, which will send notification of such filing to all counsel of record, all of whom are registered ECF participants.

/s/ Andrew Alexander

Andrew Alexander
Attorney for Plaintiff